

Message

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**From:** Victor, Meg [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=81F14AAC8CEB4EF7B1CC565354D58AC3-MVICTOR]  
**Sent:** 11/23/2018 9:49:10 PM  
**To:** Daniel Liebowitz [Daniel.Liebowitz@allnex.com]  
**Subject:** RE: P18-0212

It's on its way.

Meg

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**From:** Daniel Liebowitz <Daniel.Liebowitz@allnex.com>  
**Sent:** Friday, November 23, 2018 4:45 PM  
**To:** Victor, Meg <Victor.Meg@epa.gov>  
**Subject:** Re: P18-0212

Now is ok.

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**From:** Victor, Meg <Victor.Meg@epa.gov>  
**Sent:** Friday, November 23, 2018 4:43:28 PM  
**To:** Daniel Liebowitz  
**Subject:** RE: P18-0212

Dan – I can fax the human health report for P18-0212 now, if this is a good time to fax?

- Meg

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**From:** Victor, Meg  
**Sent:** Friday, November 23, 2018 3:13 PM  
**To:** 'Daniel Liebowitz' <Daniel.Liebowitz@allnex.com>  
**Subject:** RE: P18-0212

No worries! We'll check the human health report for P18-0212 to see if there is any 3<sup>rd</sup>-party CBI in it before sending.

Best,  
Meg

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**From:** Daniel Liebowitz <Daniel.Liebowitz@allnex.com>  
**Sent:** Friday, November 23, 2018 2:56 PM  
**To:** Victor, Meg <Victor.Meg@epa.gov>  
**Subject:** RE: P18-0212

Sorry, wrong case! Please send me a copy of the Human health report which should list the basis for the hazard concerns.

Thanks,  
Dan

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**From:** Victor, Meg [<mailto:Victor.Meg@epa.gov>]  
**Sent:** Friday, November 23, 2018 2:40 PM  
**To:** Daniel Liebowitz  
**Subject:** RE: P18-0212

Hi Dan,

You may be thinking of the other case that we discussed today.

For P-18-0212, the hazard concerns are based on the cation and on information in the SDS.

Best,  
Meg  
(202) 343-9193

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**From:** Daniel Liebowitz <[Daniel.Liebowitz@allnex.com](mailto:Daniel.Liebowitz@allnex.com)>  
**Sent:** Friday, November 23, 2018 2:31 PM  
**To:** Victor, Meg <[Victor.Meg@epa.gov](mailto:Victor.Meg@epa.gov)>  
**Subject:** RE: P18-0212

Meg,

I believe the hazard statements are based on the effects from phthalates. Would these still be required since there are no residual phthalates present in the final product? If they are still required, the statements added to the SDS would be as follows:

Based on a non-polymeric phthalate analog, the EPA has concluded the alkyd resin in this product may cause Reproductive Toxicity, Specific Target Organ Toxicity.

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**From:** Victor, Meg [<mailto:Victor.Meg@epa.gov>]  
**Sent:** Friday, November 23, 2018 1:34 PM  
**To:** Daniel Liebowitz  
**Subject:** P18-0212

Hi Dan,

The hazard statements that I mentioned are:

Reproductive toxicity (adverse effects on development of the offspring)

Specific target organ toxicity (repeated exposure)

Best,  
Meg

Meg Victor  
New Chemicals Management Branch  
EPA/OCSP/OPPT/CCD  
(202) 343-9193

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